

Michael L. Cohen, (SBN 206253)  
Heather M. McKeon (SBN: 186414)  
COHEN McKEON LLP  
1910 West Sunset Boulevard, Suite 440  
Los Angeles, California 90026  
Telephone: (213) 413-6400  
Facsimile: (213) 403-6400  
cohen@cohenmckeon.com  
mckeon@cohenmckeon.com

Attorneys for Plaintiff  
Ira Daves

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

IRA DAVES, an individual,

Plaintiff,

vs.

ERIC H. HOLDER, Attorney General  
of the United States,

Defendants

Case No.: CV-08-07376 GW (AGRx)

**JOINT REQUEST TO CONTINUE  
THE STATUS CONFERENCE CALL  
CURRENTLY SCHEDULED FOR  
JULY 30, 2010.**

STIPULATION

1. The Court has set a status conference call for Friday, July 30, 2010, at noon;

2. The purpose of the call is for the parties' attorneys to advise the Court of the status of the parties' settlement negotiations.

3. The parties have made substantial progress toward settling this dispute but still need a little more time for negotiation.

4. Both of Mr. Daves' attorneys—Michael L. Cohen and Heather M. McKeon—will be on a flight at noon this Friday for an out-of-state business meeting and therefore cannot participate in the call at noon.

5. The Government's attorney—Cindy Cipriani—has professional obligations that will make it difficult for her to participate in a call at noon this Friday.

6. Counsel for both parties are available to participate in a call on Wednesday, August 18, 2010.

7. Mr. Daves' attorneys will be unavailable from August 19<sup>th</sup> to September 6<sup>th</sup>, 2010 because of pre-paid family vacations and attendance at a pre-paid professional conference.

For these reasons, the parties hereby stipulate to the following:

8. Good cause exists to continue the status conference call with the Court.

1           9.     Subject to the Court's approval, the status conference call currently  
2 scheduled for Friday, July 30, 2010 should be continued to August 18, 2010 or to some  
3  
4 other time amenable to the Court, but not between August 19<sup>th</sup> and September 6<sup>th</sup>.  
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7 DATED: July 29, 2010

COHEN MCKEON LLP

9 By: S/MICHAEL L. COHEN  
10 Michael L. Cohen  
11 Attorney for Plaintiff,  
12 Ira Daves

13 DATED: July \_\_, 2010

U.S. Attorneys Office

15 By: S/CINDY M. CIPRIANI  
16 Cindy M. Cipriani  
17 Attorney for Defendant  
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